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Transcript of Charles Beegle

Date: October 27, 2023
Case: Iacobeti -v- Weeks

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Transcript of Charles Beegle
Conducted on October 27, 2023

1 (1 to 4)

1	IN THE UNITED STATES COURT FOR THE DISTRICT OF MARYLAND NORTHERN DIVISION	1	A P P E A R A N C E S	3
2	-----	2	ON BEHALF OF PLAINTIFF:	
3	ANDREEA IACOBETI,	3	WILLIAM C. HUDSON, ESQUIRE	
4	Plaintiff,	4	Law Office of William C. Hudson	
5	v.	5	9748 Stephen Decatur Highway	
6	GENNA LEIGH ROSE WEEKS,	6	Suite 111	
7	Defendant.	7	Ocean City, Maryland 21842	
8	-----	8	(410)390-7745	
9	Mobile Videoconference Deposition of	9		
10	CHARLES BEEGLE	10		
11	Conducted Virtually	11		
12	Friday, October 27, 2023	12	ON BEHALF OF DEFENDANT:	
13	3:15 p.m.	13	DAVID H. FLEISHMAN, ESQUIRE	
14		14	Budow and Noble, P.C.	
15		15	Twinbrook Metro Plaza	
16	Job No.: 511219	16	12300 Twinbrook Parkway	
17	Pages 1 through 78	17	Suite 540	
18	Reported by: Peggy L. Dingle	18	Rockville, Maryland 20852	
19		19	(301)654-0896	
20		20		
21		21		
22		22		
1	Mobile videoconference deposition of	1	C O N T E N T S	4
2	CHARLES BEEGLE, conducted virtually:	2	EXAMINATION OF CHARLES BEEGLE	PAGE
3		3	By Mr. Fleishman	5
4		4	By Mr. Hudson	39
5		5	By Mr. Fleishman	69
6		6	By Mr. Hudson	73
7	Pursuant to agreement, before Peggy L.	7		
8	Dingle, E-Notary Public of the State of Maryland.	8		
9		9		
10		10	E X H I B I T S	
11		11	(Retained by Counsel)	
12		12	BEEGLE DEPOSITION EXHIBIT	PAGE
13		13	1 Photograph	17
14		14	2 Photograph	22
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<p>61</p> <p>1 the defendant, the vehicle that struck the young 2 lady, was traveling the speed limit as she 3 entered the intersection, correct? 4 A I would say yes. 5 Q Okay. And you indicated that as she 6 entered the intersection there were four 7 pedestrians in the crosswalk westbound, correct? 8 A I don't know where the other three 9 were at the time that your client got hit. 10 Q Understood. But -- but prior to that 11 when you first saw the young lady -- 12 A Okay. 13 Q -- you indicated that there were three 14 other pedestrians who were walking several feet 15 behind her westbound, correct? 16 A Correct. 17 Q And I am just trying to understand 18 your perspective on this. Please forgive me. 19 A No problem. 20 Q But you have got -- you have got a 21 yellow flashing light which means proceed with 22 caution. You have got four pedestrians in a</p>	<p>63</p> <p>1 A I am not going to speculate. I 2 don't -- I don't know, honestly. 3 Q Can you make -- can you, as you sit 4 here today, tell me any observations you made 5 that would serve as basis for believing that she 6 applied her brakes at any time prior to the point 7 of impact. 8 A As soon as she hit that pedestrian she 9 stopped immediately. I didn't hear tires 10 screeching or anything. It -- it seemed like it 11 was she hit and the car stopped at the same time. 12 Q Again, the question was prior to the 13 point of impact did you make any observations -- 14 A I did not. 15 Q -- that serves as the basis -- you did 16 not. Okay. I am almost done, I promise you. 17 A I hope everything works out for both 18 sides. I know it was a scary, scary situation. 19 I am glad she is alive. 20 Q She is, too. 21 MR. FLEISHMAN: Everyone is. 22 THE WITNESS: Yeah.</p>
<p>62</p> <p>1 clearly designated, painted crosswalk and you 2 have got a driver who drives into an intersection 3 controlled by a yellow flashing light at the 4 posted speed limit. And -- and -- and am I 5 correct that you think there was nothing she 6 could do that would have avoided this accident? 7 MR. FLEISHMAN: Objection to the form. 8 MR. HUDSON: Understood. 9 BY MR. HUDSON: 10 Q You can answer. 11 A Correct. In my -- in my opinion, 12 yeah, I don't think there is anything that she 13 could have done. 14 Q Okay. You indicated that she jammed 15 on her brakes. At what point did you see any 16 evidence that she was applying her brakes prior 17 to the impact? 18 A I -- I couldn't tell that she braked 19 prior to the impact. I couldn't tell. I 20 couldn't see her rear end. 21 Q Do you have any reason to believe she 22 braked prior to the impact?</p>	<p>64</p> <p>1 BY MR. HUDSON: 2 Q Now, you indicated that when you spoke 3 with the officer he asked you some questions and 4 then he wrote things down. 5 A Yes. 6 Q And there is -- there is a written 7 statement that was produced by the Ocean City 8 Police Department, and I -- I see where you 9 signed it. The handwriting, though, that -- that 10 describes what you saw did you write that or did 11 he? 12 A That was me. So he wrote in his 13 notebook my information, right? And then he went 14 back to his car and gave me a paper and it said 15 to -- he told me to explain in very good detail 16 that I can remember what happened. So everything 17 was in my -- my writing. 18 Q Okay. 19 A I hope you can read it because I don't 20 write the best. 21 Q No, it's -- it's -- compared to mine 22 it's wonderful.</p>

<p>69</p> <p>1 to --</p> <p>2 MR. FLEISHMAN: Yeah, so I have to see</p> <p>3 what happened. It might be helpful to me. I</p> <p>4 know we have the police report and the narrative</p> <p>5 but I didn't see --</p> <p>6 MR. HUDSON: Bear with me one second,</p> <p>7 David.</p> <p>8 MR. FLEISHMAN: Sure. We can go off</p> <p>9 the record for a minute.</p> <p>10 (Thereupon, a break was taken, and the</p> <p>11 deposition continued as follows:)</p> <p>12 EXAMINATION BY COUNSEL FOR DEFENDANT</p> <p>13 BY MR. FLEISHMAN:</p> <p>14 Q All right. I will agree that your</p> <p>15 handwriting is better than mine as well.</p> <p>16 All right. Just a few very brief</p> <p>17 follow-ups. The -- I know that Mr. Hudson had</p> <p>18 asked you about the lane in which my client's</p> <p>19 vehicle was in at the time of the impact, right?</p> <p>20 A Okay.</p> <p>21 Q And you had said lane four, which is</p> <p>22 that lane directly next to that left turning</p>	<p>71</p> <p>1 A Yes.</p> <p>2 Q And you didn't hear any tires</p> <p>3 screeching?</p> <p>4 A Not that I recall, no.</p> <p>5 Q Okay. And you didn't see any, like,</p> <p>6 tire marks or skidmarks?</p> <p>7 A To be honest with you, I didn't look</p> <p>8 for tire marks or skidmarks, no.</p> <p>9 Q All right. Would you -- based on how</p> <p>10 you described it with the car stopping within</p> <p>11 seconds of hitting her, would you agree that the</p> <p>12 car had to be slowing down before the impact?</p> <p>13 A For it to stop as soon as it hit the</p> <p>14 pedestrian, yeah, I would say yes.</p> <p>15 Q Okay. And that's what you are saying</p> <p>16 happened?</p> <p>17 A Yes.</p> <p>18 Q And as far as going the speed limit,</p> <p>19 that's what you are estimating? She could have</p> <p>20 been going less than the speed limit, could have</p> <p>21 been going the speed limit? You are not...</p> <p>22 A See, Mr. -- Mr. Hudson asked me if I</p>
<p>70</p> <p>1 lane?</p> <p>2 A Correct.</p> <p>3 Q All right. And -- and I just want to</p> <p>4 confirm that when I was questioning you the first</p> <p>5 time that you saw her vehicle was when you had</p> <p>6 said the front of her vehicle would have been</p> <p>7 towards the back of that white car?</p> <p>8 A That is correct.</p> <p>9 Q Okay. And so you saw her vehicle only</p> <p>10 very shortly before the impact?</p> <p>11 A Correct.</p> <p>12 Q Just a few seconds you said?</p> <p>13 A Correct.</p> <p>14 Q All right. And so if she was</p> <p>15 traveling in a different lane before that and had</p> <p>16 moved over to that lane immediately before, you</p> <p>17 wouldn't know that?</p> <p>18 A That is correct. I wouldn't have</p> <p>19 noticed.</p> <p>20 Q And you indicated that her -- that my</p> <p>21 client's vehicle came to a stop at the moment of</p> <p>22 the impact?</p>	<p>72</p> <p>1 noticed that she was slowing down. And I did</p> <p>2 not -- I -- I can't tell if she was slowing down</p> <p>3 or not. That's why I think she was going the</p> <p>4 speed limit because as soon as she hit that lady</p> <p>5 she stopped instantly.</p> <p>6 Now, I am not sure what the speed</p> <p>7 limit is. So she couldn't have been going that</p> <p>8 fast is why I am saying that because as soon as</p> <p>9 she hit that lady she come to an instant stop.</p> <p>10 Q Okay. That's fair. We keep saying</p> <p>11 the speed limit but I guess no one has actually</p> <p>12 asked the question of what -- what do you believe</p> <p>13 the speed limit was?</p> <p>14 A Yeah, I -- I think it's 35 or 45 but I</p> <p>15 could be wrong. I don't know.</p> <p>16 Q Okay. And would you agree with me if</p> <p>17 she was going 35 at the time of the impact the</p> <p>18 car wouldn't have just been able to stop?</p> <p>19 A Right. Correct.</p> <p>20 Q All right. So she had -- you would --</p> <p>21 it would make sense that she was probably going</p> <p>22 less than that at the time?</p>

<p>73</p> <p>1 A Yes.</p> <p>2 Q And --</p> <p>3 MR. FLEISHMAN: Well, actually, I</p> <p>4 think that's all that I got.</p> <p>5 Bill?</p> <p>6 MR. HUDSON: I have one further line</p> <p>7 of questioning, if you -- if you will indulge me.</p> <p>8 EXAMINATION BY COUNSEL FOR PLAINTIFF</p> <p>9 BY MR. HUDSON:</p> <p>10 Q Did -- did you happen to see where her</p> <p>11 phone went as a result of the impact?</p> <p>12 A I did not. I remember her phone</p> <p>13 sliding across the blacktop towards the middle.</p> <p>14 I don't know how far away from her it was but I</p> <p>15 do you remember her phone flying and sliding</p> <p>16 across the road.</p> <p>17 Q Do you recall anything about what</p> <p>18 happened to her earbuds as a result?</p> <p>19 A I -- I do not.</p> <p>20 Q Do you recall whether she was carrying</p> <p>21 anything other than her cell phone?</p> <p>22 A I don't remember.</p>	<p>75</p> <p>1 mine.</p> <p>2 Q Do you recall whether she was wearing</p> <p>3 eyeglasses or sunglasses?</p> <p>4 A I don't remember. I don't think she</p> <p>5 was wearing either but I -- I honestly don't</p> <p>6 remember.</p> <p>7 Q Do you recall whether she spoke with</p> <p>8 an accent?</p> <p>9 A I think she had a little accent. I am</p> <p>10 from Pennsylvania. So everybody further south of</p> <p>11 me has a little accent.</p> <p>12 MR. HUDSON: Okay. I -- I have no</p> <p>13 further questions. Thanks again.</p> <p>14 MR. FLEISHMAN: All right, Mr. Beegle,</p> <p>15 that's it. So we appreciate your time.</p> <p>16 I have just got to let you know that</p> <p>17 you have the -- you have the right to read your</p> <p>18 deposition transcript and the court reporter can</p> <p>19 send it to you. You can read it. You can</p> <p>20 confirm everything in there is accurate and then</p> <p>21 you can sign or you can waive that right and</p> <p>22 under the assumption that the court reporter was</p>
<p>74</p> <p>1 Q Other than that she was wearing a</p> <p>2 holiday -- Quality Inn shirt or a badge or</p> <p>3 something, do you remember anything about her</p> <p>4 attire?</p> <p>5 A She had -- I do not. I just remember</p> <p>6 the badge saying Quality Inn and her name.</p> <p>7 Q But you don't remember whether she was</p> <p>8 wearing shorts or long pants?</p> <p>9 A I do not.</p> <p>10 Q Don't recall the color of her pants?</p> <p>11 A I do not.</p> <p>12 Q Don't recall what kind or color of</p> <p>13 shirt she was wearing?</p> <p>14 A I think it was black but I am not a</p> <p>15 hundred percent sure.</p> <p>16 Q Do you recall what kind of footwear</p> <p>17 she was wearing?</p> <p>18 A No, I don't remember that, either.</p> <p>19 Q Do you remember whether she had long</p> <p>20 or short hair?</p> <p>21 A I think it was shoulder length. Is</p> <p>22 that long? It's longer than yours. Longer than</p>	<p>76</p> <p>1 able to understand and hear everything that you</p> <p>2 said and accurately recorded your testimony.</p> <p>3 I can't advise you but it's totally up</p> <p>4 to you what you want to do. Ordinarily people --</p> <p>5 THE WITNESS: I will waive.</p> <p>6 MR. FLEISHMAN: Okay. Ordinarily</p> <p>7 people do if there is no issues hearing but let's</p> <p>8 just ask the court reporter first, make sure.</p> <p>9 COURT REPORTER: Everything sounded</p> <p>10 fine.</p> <p>11 MR. FLEISHMAN: Okay. All right, Mr.</p> <p>12 Beegle.</p> <p>13 THE WITNESS: I will waive everything.</p> <p>14 That's all I can remember. I am totally honest</p> <p>15 so...</p> <p>16 MR. FLEISHMAN: We appreciate your --</p> <p>17 we appreciate your time.</p> <p>18 THE WITNESS: Thank you, guys. I</p> <p>19 appreciate it.</p> <p>20 COURT REPORTER: And, Mr. Hudson, are</p> <p>21 you ordering a copy of the transcript?</p> <p>22 MR. HUDSON: I am going to wait until</p>